

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

:

: S6 09 CR 581 (WHP)

- v. -

: **PETITIONERS' MOTION FOR  
RECONSIDERATION AND  
REARGUMENT OF THE COURT'S  
DENIAL OF THEIR MOTION FOR  
SANCTIONS AGAINST THE  
GOVERNMENT**

PAUL M. DAUGERDAS,

Defendant.

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ELEANOR DAUGERDAS,  
PMD INVESTMENTS LLC, and  
WBLG WALWORTH LLC,

:

:

Petitioners.

*Quinlan*  
*James R. DeVita*  
*10/13/21*

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**PLEASE TAKE NOTICE** that pursuant to Local Civil Rule 6.3 of the Local Rules of the United States District Court for the Southern District of New York, Petitioners Eleanor Daugerdas, PMD Investments LLC and WBLG Walworth LLC, hereby move this Court for reconsideration and reargument of the Court's September 28, 2021 Order and Opinion denying petitioners' motion for an order imposing sanctions on the United States of America pursuant to Rule 37(b)(2)(A) and (C), Federal Rules of Civil Procedure, and the Court's inherent power to manage its own affairs, for its failure to produce documents as required by an Order of this Court dated July 26, 2018 (Docket No. 935), and its failure to preserve documents within its custody and control.

Dated: Westchester County, New York  
October 12, 2021

s/ James R. DeVita  
**James R. DeVita (JRD 5659)**  
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